

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION**

STATE OF NEBRASKA, et al.,

Plaintiffs,

v.

JOSEPH R. BIDEN, Jr., et al.,

Defendants.

No. 4:22-cv-01040

**PLAINTIFF STATES' MOTION FOR LEAVE TO EXCEED
THE PAGE LIMIT FOR THE REPLY MEMORANDUM
IN SUPPORT OF THEIR MOTION FOR PRELIMINARY INJUNCTION**

Under Local Rule 4.01(D), a party may file “any motion, memorandum, or brief which exceeds fifteen (15) pages” with leave of the Court. Plaintiff States respectfully request such leave for their reply memorandum in support of their motion for preliminary injunction. Because the legal issues are complex and significant—involving the propriety of a federal agency taking the unprecedented step of unilaterally erasing approximately a half trillion dollars in student loan debt—leave is appropriate.

The Court previously granted leave for Plaintiffs to file a 45-page memorandum in support of their motion and for Defendants to file a 45-page memorandum in opposition to the motion. Also, in Defendants’ opposition filing, they publicly produced for the first time the internal agency memoranda attempting to justify their actions, prompting Plaintiffs to spend extra space responding to it. Accordingly, a modest enlargement of the length of the reply memorandum is in order.

For these reasons, Plaintiffs respectfully ask the Court to grant them leave to file a reply memorandum in support of their motion for preliminary injunction that exceeds 15 pages but does not exceed 25 pages of argument.

Dated: October 11, 2022

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CERTIFICATE OF SERVICE

I hereby certify that on October 11, 2022, a true and correct copy of the foregoing was filed electronically using the Court's CM/ECF system and, through that system, was served on counsel for all parties.

/s/ James A. Campbell
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